

## UNITED STATES DISTRICT COURT

for the  
Eastern District of California

In the Matter of the Search of )

(Briefly describe the property to be searched or identify the person by )  
name and address)Information associated with the TextNow Inc. account )  
registered to the email address )"joe680232@gmail.com", that is stored at premises )  
owned, maintained, controlled, or operated by TextNow )  
Inc. 2710 Gateway Oaks Drive, Suite 150N )  
Sacramento, CA )

Case No. 5:23-MJ-135 (ML)

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Eastern District of California there is now concealed (identify the person or describe the property to be seized):  
See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

## Code Section

18 U.S.C. § 2252A(a)(1)

18 U.S.C. § 2252A(a)(2)(A)

18 U.S.C. § 2252A(a)(5)(B)

18 U.S.C. § 2422(b)

18 U.S.C. § 2251 (a)

## Offense Description

Transportation of child pornography

Distribution, receipt, and attempted receipt of child pornography

Possession of child pornography

Enticement of a minor to engage in sexual activity

Sexual exploitation of children

The application is based on these facts:  
See attached affidavit☒ Continued on the attached sheet.☐ Delayed notice of \_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

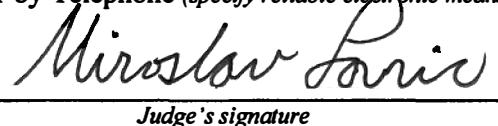

Applicant's signature

Lindsey R. Valentino, HSI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by Telephone (specify reliable electronic means).

Date: 3/6/2023



Judge's signature

City and state: Binghamton, NY

Hon. Miroslav Lovric, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT**

I, Lindsey Valentino, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a search warrant for information associated with the email account, "joe680232@gmail.com" (hereinafter "Target Account") that is stored at the premises owned, maintained, controlled, or operated by TextNow Inc. located at 2710 Gateway Oaks Drive, Suite 150N Sacramento, California. The information to be searched is described in the following paragraphs and is further described in Attachment A. This affidavit is made in support of an application for a search warrant under title 18 United States Code sections 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require TextNow, Inc. to disclose to the government records and other information in its possession pertaining to the subscriber or customer associated with the account, including the contents of communications.

2. Your affiant is a Special Agent employed by Homeland Security Investigations (HSI) since September 2019. Your affiant successfully completed the Criminal Investigatory Training Program and the Homeland Security Investigations Special Agent Training at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. While at training, your affiant received training in child exploitation investigations. Prior to working as a Special Agent, your affiant was a United States Border Patrol Intelligence Agent (BPAI) and a Task Force Officer (TFO) with HSI's Border Enforcement Security Task Force (BEST) in Massena, New York. Your affiant has investigated and assisted in the prosecution of child exploitation related crimes, and your affiant has executed several search warrants for various state and federal felony crimes. Prior to working as an intelligence agent and a TFO, your affiant was a United States Border Patrol

Agent in Massena, New York and San Diego, California. Your affiant received their Bachelor of Science Degree in Criminal Justice from Medaille College in Buffalo, New York. Your affiant regularly investigates criminal violations of title 18 United States Code, sections 2251 (the sexual exploitation of children), and 2252A (distribution, receipt, and possession of child pornography).

3. The facts in this affidavit come from my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training, experience, and the facts set forth in this affidavit, there is probable cause to believe that contraband, evidence, fruits and instrumentalities of violations of 18 U.S.C. §§ 2252A(a)(1) (transportation of child pornography), 2252A(a)(2)(A) (distribution, receipt and attempted receipt of child pornography), 2252A(a)(5)(B) (possession of child pornography), 2422(b) (enticement of a minor to engage in sexual activity), and 2251(a) (sexual exploitation of a child) are contained in the TextNow records related to the Target Account.

### **JURISDICTION**

5. The Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. *See* 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “as district court of the United States... that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

### **CHILD PORNOGRAPHY ON THE INTERNET**

6. Pursuant to your affiant’s training and experience, as well as the training and experience of other law enforcement personnel, your Affiant has learned that child pornography is not readily available in retail establishments. Accordingly, individuals who wish to obtain child

pornography do so by ordering it from abroad or by discreet contacts with other individuals who have it available. The use of the internet to traffic in, trade, or collect child pornography has become one of the preferred methods of obtaining this material. An individual familiar with the internet can use it, usually in the privacy of his own home, to interact with another individual or a business offering such materials. The use of the internet offers individuals interested in obtaining child pornography a sense of privacy and secrecy not available elsewhere.

7. Based upon your affiant's training and experience, your affiant knows the following:

a. The internet is a worldwide network of computer systems operated by governmental entities, corporations, and universities. In order to access the internet, an individual computer user must subscribe to an access provider, which operates a host computer system with direct access to the internet. The World Wide Web (www) is a functionality of the internet, which allows users of the internet to share information.

b. With a computer connected to the Internet, an individual computer user can make electronic contact with millions of computers around the world. This connection can be made by any number of means, including modem, local area network, wireless and numerous other methods.

**TECHNICAL INFORMATION REGARDING TEXTNOW, INC.**

8. TextNow, Inc., a VoIP (Voice over Internet Protocol) cellular service provider is a provider of an electronic communications service, as defined in 18 U.S.C. § 2510(15), and/or a remote computing service, as defined in 18 U.S.C. § 2711(2). Specifically, TextNow provides an Internet and cellular based multimedia messaging service, via a cross-platform smartphone

application that enables users to communicate with each other via text, voice, and video. Users can also exchange recorded audio and video messages, photos and other files, and their location. Communication with other users over TextNow does not require Internet access in all cases.

9. The TextNow application can be used on multiple devices under the same login at the same time. The TextNow application can be used on Android devices such as Android smartphones and Android tablets. Unlike other messaging (i.e. WhatsApp, Telegram, etc.), TextNow provides end-to-end telephony services embedded within the application. Computer/Tablet users can also access the TextNow service through our website in their web browser. It is similar to a network service provider, which provides an individual with a SIM card to use network data services to make calls, send text messages, and connect to the Internet. TextNow requires an area code for a location, then it provides the phone number, then the phone number can be used to make phone calls or send text messages.

10. Based on my review of the available online literature related to TextNow, the contents of TextNow's website, and conversations with other agents, it is my understanding that TextNow stores information related to its users interaction with the service. For example, TextNow stores subscriber information that will include name, address, billing data, and other personal information used to identify specific accounts. In addition, it is my understanding that TextNow stores user SMS and MMS messages including the content of those conversations and any multimedia shared between users. TextNow also stores IP addresses associated with account activity.

### **DEFINITIONS**

11. The following definitions apply to this affidavit and Attachment A and B:

- a. “Chat,” as used herein, refers to any kind of text communication over the Internet that is transmitted in real-time from sender to receiver. Chat messages are generally short in order to enable other participants to respond quickly and in a format that resembles an oral conversation. This feature distinguishes chatting from other text-based online communications such as Internet forums and email.
- b. “Computer,” as used herein, refers to “an electronic, magnetic, optical, electrochemical, or other highspeed data processing device performing logical or storage functions and includes any data storage facility or communications facility directly related to or operating in conjunction with such device” and includes smartphones, and mobile phones and devices. *See* 18 U.S.C. § 1030(e)(1).
- c. “Internet Protocol address” or “IP address,” as used herein, refers to a unique number used by a computer or other digital device to access the Internet. IP addresses can be “dynamic,” meaning that the ISP assigns a different unique number to a computer every time it accesses the Internet. IP addresses might also be “static”, if an ISP assigns a user’s computer a particular IP address that is used each time the computer assesses the Internet.
- d. The “Internet” is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

**PROBABLE CAUSE**

12. On or about January 24, 2023, Investigator Robert Obrist from the Oswego County Sheriff’s Department (“OCSD”) executed a residential search warrant at the residence of Austin TENNANT and his father Sean Tennant. Austin TENNANT had been previously arrested by the

OCSD in August of 2022 for New York State violations involving the promotion of a sexual performance by a child less than 17 years of age. During the execution of the search warrant, TENNANT was the only person at the home. When officers knocked on TENNANT's door, he answered it without wearing pants. Before being transported to the police station, TENNANT asked to put his pants on. A Galaxy A7 Lite Tablet (the "Tablet") was found open and in use near where his pants were located next to a reclining couch. The Tablet was seized subject to the residential search warrant.

13. After the execution of the residential search warrant, Investigator Obrist began a forensic examination of the Tablet pursuant to the search warrant. The Tablet was found to have attribution data linking it to TENNANT.

14. A forensic examination of the Tablet revealed that it had 41 pictures that have associated metadata showing they were taken by the Tablet. One image is black, and the image is not discernable. The other 40 pictures taken with the tablet all contain recognizable images that can be associated with TENNANT. This includes 14 pictures of his face, along with multiple pictures of his body. Other photos taken with the tablet include his cat and the inside of TENNANT's truck. The only picture of someone other than TENNANT taken with the tablet is one of his father, Sean Tennant. The picture does not include Sean Tennant's face, and appears to have been taken by someone else in their living room, sitting in the area of the couch where the tablet was found. Some of the pictures show TENNANT masturbating in the exact part of the couch where the tablet was found. TENNANT is recognizable in these images based on his build, skin tone, body hair, and the fact that he appears to be wearing the same orange shirt he was arrested in.

15. During the forensic examination, Investigator Obrist observed many chat messages on the Tablet where the user stated to other users “I’m Austin,” and provided his accurate age as 28.

16. Examination of the Tablet also showed that TENNANT talked to at least two people he knows personally on the Tablet using the TextNow account joe680[XXX]@gmail.com, one being an individual with the initials A.H. at phone number 704-[XXX]-7463, and the other being E.T. at phone number 315-[XXX]-6790. A.H. informed Investigator Obrist via email that she met TENNANT on Tinder, where he used a different name and a profile of picture of someone else. A.H. sent your affiant a screenshot of the Tinder profile, and your affiant was also able to locate the screenshot in the Tablet extraction. A.H. also confirmed that TENNANT is associated with the TextNow account logged into the Tablet.

17. TENNANT has made phone calls to another individual with the initials E.T. at phone number 315-[XXX]-6790 from the jail since he was arrested. The data extracted from the Tablet as part of the forensic examination includes a TextNow conversation where TENNANT arranges to meet with E.T. at the Flamingo Bowl on 12/17/2022. As part of the conversation, TENNANT tells E.T. that he [TENNANT] is parked under the Flamingo Bowl sign. The data on the Tablet also includes a picture taken with the tablet that same night showing the dashboard of TENNANT’s truck. The reflection of the Flamingo Bowl sign can be seen in the entertainment console of his truck.

18. Based on my experience, the Tablet can be linked to TENNANT because of the location and circumstances of where it was recovered as well as evidence of user attribution recovered during the forensic examination of the Tablet.



19. Based on forensic review of the Tablet, TENNANT began using it in early September 2022, to start communicating with minor victims and to send and receive child sexual abuse material (“CSAM”).

20. During the forensic examination of the Tablet, Investigator Obrist recovered numerous image and video files depicting CSAM. Investigator Obrist also located several chats on the Tablet that originated from the TextNow application.

21. During your affiant’s review of the forensic examination of the Tablet, your affiant saw multiple TextNow conversations between the Target Account and individuals claiming to be under the age of 18. One such conversation took place on January 21, 2023. The relevant portion of the chat is set forth below:

414-[XXX]-6518: “Hey”

**TARGET ACCOUNT:** “Hey age”

414-[XXX]-6518: “14”

**TARGET ACCOUNT:** “U b with older guys”

414-[XXX]-6518: “I’m a virgin”

**TARGET ACCOUNT:** “Wow ok send pics”

414-[XXX]-6518: “Just a minute...”

**TARGET ACCOUNT:** “ok why”

414-[XXX]-6518: “I need to take pictures”

**TARGET ACCOUNT:** “Ok baby show all of u face to”

414-[XXX]-6518: “ok”

414-[XXX]-6518: *sends picture via TextNow*

**TARGET ACCOUNT:** *sends picture via TextNow*

**TARGET ACCOUNT:** “Ok keep showing I wqanna see all my babe”

414-[XXX]-6518: *sends picture via TextNow*

**TARGET ACCOUNT:** “I am in love wow baby”

414-[XXX]-6518: “Thanks!”

**TARGET ACCOUNT:** “Yes im 28 but we can date”

22. An example of another portion of the same conversation on the same date between the Target Account and 414-[XXX]-6518 is set forth below:

**TARGET ACCOUNT:** “So I can come”

414-[XXX]-6518: “How soon?”

**TARGET ACCOUNT:** “How soon?”

**TARGET ACCOUNT:** “Maybe Monday”

414-[XXX]-6518: “Do you worry about someone catching us at a hotel?”

**TARGET ACCOUNT:** “I mean it’s the only place we can right”

414-[XXX]-6518: “You don’t have a place here?”

**TARGET ACCOUNT:** “Ur not going to tell on us right I can trust u”

414-[XXX]-6518: “Believe me, I don’t want to get caught either”

**TARGET ACCOUNT:** “I stay in hotel”

**TARGET ACCOUNT:** “Ok good”

**TARGET ACCOUNT:** “I want to fuck u a lot and stay with you”

414-[XXX]-6518: “How will you stay with me?”

**TARGET ACCOUNT:** “How will you stay with me?”

**TARGET ACCOUNT:** “Urvparents know ur gay”

414-[XXX]-6518: “They don’t, and it needs to stay that way”

23. The conversation between the Target Account and the user attached to the number, 414-[XXX]-6518, continues in a sexual manner. Below is an additional example of the conversation which includes the exchange CSAM.

**TARGET ACCOUNT:** “First time I fuck you we will clean u up in the shower”

**TARGET ACCOUNT:** “It’s gonna hurt a little until I open you”

414-[XXX]-6518: “Ok”

**TARGET ACCOUNT:** “Show a close up of your hole”

414-[XXX]-6518: “How long will you want to fuck the first time?”

414-[XXX]-6518: “Ok”

**TARGET ACCOUNT:** “Be slow and lot Of lube just gonna get you lose and open”

**TARGET ACCOUNT:** “Be a little while”

414-[XXX]-6518: *An attachment was sent via TextNow depicts a male anus being exposed by two hands pulling apart the buttocks. There appears to be a blue poster in the background on the wall.*

24. There are additional images within the above listed conversation that depict a male approximately 14 years of age, completely nude in a bathroom, with the same blue poster in the background.

25. The Target Account participated in another conversation utilizing TextNow on January 14, 2023, with the phone number, 724-[XXX]-9752. In that conversation, the Target Account pretended to be a sixteen-year-old female. The user of the phone number, 724-[XXX]-9752, describes themselves as a 15-year-old female. The conversation quickly escalates to the Target Account asking the 15-year-old female to undress, take pictures, and sexually molest the 1-year-old child she is babysitting. The relevant portions of that conversation are set forth below:

**TARGET ACCOUNT:** “I’m 16 f”

724-[XXX]-9752: “I’m 15 and I’m a female and ur not to old”

724-[XXX]-9752: “For me”

**TARGET ACCOUNT:** “ok cool can u selfie”

724-[XXX]-9752: *sends an image via TextNow, image not considered CSAM*

724-[XXX]-9752: “Ik ugly”

**TARGET ACCOUNT:** “Ur hot”

724-[XXX]-9752: “Thxb”

**TARGET ACCOUNT:** “Like legit”

724-[XXX]-9752: “Thx”

**TARGET ACCOUNT:** “Can we sext”

**TARGET ACCOUNT:** “Can we sext”

**TARGET ACCOUNT:** *Image sent via TextNow, image not considered CSAM*

724-[XXX]-9752: “Ur hot asf”

**TARGET ACCOUNT:** “Lemme see u naked bb”

724-[XXX]-9752: “Ok I will but I can’t rn bc I’m baby sitting”

**TARGET ACCOUNT:** “Mmmm I have a kink for little hehe how old are they”

724-[XXX]-9752: “He’s 1 year old”

**TARGET ACCOUNT:** “That’s soo cute can u take pics of him”

724-[XXX]-9752: “Sure”

**TARGET ACCOUNT:** “Ok and nude of him”

724-[XXX]-9752: *Image sent via TextNow, not considered CSAM.*

**TARGET ACCOUNT:** “I want u bad now”

**TARGET ACCOUNT:** “I want u bad now”

**TARGET ACCOUNT:** *Send Image via TextNow, Image does not depict CSAM.*

724-[XXX]-9752: “Yea”

**TARGET ACCOUNT:** “Can u undress him”

**TARGET ACCOUNT:** “And lick his pp”

724-[XXX]-9752: “I can’t bc I don’t want to do that”

**TARGET ACCOUNT:** “Plss bb”

**TARGET ACCOUNT:** “Is he ur bro”

724-[XXX]-9752: “But”

**TARGET ACCOUNT:** “Plsss I want u to try”

26. The conversation continues with the Target Account attempting to pressure the user of phone number, 724-[XXX]-9752, to perform oral sex on the 1-year-old child. The Target Account later states in the TextNow conversation, “Causee I get wet and horny when I see littles

nakey”. Further in the conversation the user of phone number, 724-[XXX]-9752, sends images of a female approximately 15 years of age. The images depict the naked breasts of a 15-year-old female, and naked pubic region of a female approximately 15 years of age.

27. The Target Account had an additional conversation via TextNow with the phone number, 321-[XXX]-3773 on January 16, 2023. Within the cache files related to that conversation were images consistent with CSAM. The majority of the conversation between the Target Account and 321-[XXX]-3773, discussed sexually abusing children. The following is a description of some of the CSAM images found within the above-mentioned conversation:

- a. Depiction of a female approximately five years old being anally penetrated by an adult thumb.
- b. Depiction of a female approximately 4 years old, nude from the waist down, her legs are spread, exposing her vagina. The primary focus of the image is on the child’s vagina.
- c. Depiction of a female approximately 9 years old, holding a gaming controller, she is nude from the waist down, her legs are spread open, her vagina and anus are exposed.
- d. Depiction of a female infant or toddler being anally penetrated by an adult male penis.

**INFORMATION TO BE SEARCHED AND THING TO BE SEIZED**

28. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require TextNow Inc. to disclose to the government copies of the records and other information **(including the content of communications)** particularly described in Section I of Attachment B,

as they pertain to the Target Accounts described in Attachment A. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

29. Additionally, to ensure compliance with 18 U.S.C. § 2252A, TextNow Inc. does not mail, transport or deliver by computer child pornography to any person other than as permitted as part of making a report to the National Center for Missing and Exploited Children pursuant to 18 U.S.C. § 2258. Accordingly, absent permission by the Court, TextNow Inc. will not transmit information responsive to this warrant should it contain, as is anticipated, child pornography. The Court has the authority to order TextNow Inc. to disclose responsive data to the Court's search warrant by sending it to the Government using the U.S. Postal Service or another courier service, notwithstanding 18 U.S.C. § 2252A, or similar statute or code. TextNow Inc. routinely complies with such orders, which do not place any unreasonable burden on TextNow Inc. Accordingly, Attachment B allows for TextNow Inc. to comply with the warrant by sending results to your affiant by U.S. Mail or other courier.

### **CONCLUSION**

30. Based on forgoing, your Affiant respectfully submits that there is probable cause to believe that the Text Now Inc. account associated with the email address, "joe680232@gmail.com" contains evidence of violations of 18 U.S.C. §§ 2252A(a)(1) (transportation of child pornography), 2252A(a)(2)(A) (distribution, receipt and attempted receipt of child pornography), 2252A(a)(5)(B) (possession of child pornography), 2422(b) (enticement of a minor to engage in sexual activity), and/or 2251(a) (sexual exploitation of children). Your Affiant further submits that the evidence of these offenses are located within the TextNow, Inc. account "joe680232@gmail.com" and stored on computers maintained by TextNow, Inc.

31. Your Affiant, therefore, respectfully requests that the attached warrant be issued authorizing the search of the TextNow, Inc. account registered to the email address "joe680232@gmail.com" and authorizing the search and seizure of the items described in Attachment B.



Lindsey R. Valentino  
Special Agent  
Homeland Security Investigations

I, the Honorable Miroslav Lovric, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on the 6 day of March 2023, in accordance to Rule 4.1 of the Federal Rules of Criminal Procedure.



Hon. Miroslav Lovric  
United States Magistrate Judge

**ATTACHMENT A**

**Property to Be Searched**

This warrant applies to information associated with the TextNow Inc. account registered to the email address “joe680232@gmail.com”, that is stored at premises owned, maintained, controlled, or operated by TextNow Inc. 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA.



## **ATTACHMENT B**

### **Particular Things to be Seized**

#### **I. Information to be disclosed by TextNow Inc.**

To the extent that the information described in Attachment A is within the possession, custody, or control of TextNow Inc. regardless of whether such information is located within or outside of the United States, and including any messages, records, files, logs, or information that has been deleted but is still available to TextNow Inc., or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), on January 26, 2023, TextNow Inc. is required to disclose the following information to the government for each account or identifier listed in Attachment A:

- A. All business records and subscriber information, in any form kept, pertaining to the Target Account, including:
  - 1. Identity and contact information (past and current), including full name, e-mail addresses, username, physical address, date of birth, phone numbers, phone ownership from date, phone ownership to date, registration date, registration IP address, and plan type;
  - 2. All prior account numbers and the date and time each account number was active, (including those linked by machine cookie), and all records or other information about connections with third-party websites, and mobile apps (whether active, expired, or removed);
  - 3. Length of service (including start date), types of services utilized, purchases, and means and sources of payment (including any credit card or bank account number) and billing records;
  - 4. Devices used to login to or access the Account, including all device identifiers, attributes, user agent strings, and information about networks and connections, cookies, operating systems, and apps and web browsers;
  - 5. All advertising information, including advertising IDs and ad activity;
  - 6. Internet Protocol (“IP”) addresses used to create, login, and use the Account, including associated dates, times, and port numbers;
  - 7. Privacy and account settings, including change history; and

8. Communications between TextNow Inc., and any person regarding the Account, including contacts with support services and records of actions taken;
- B. All Message Logs associated with the Target Account and all transactional records outlining when the Target Account sent or received a text message and when a TextNow user initiated a video call, between September 1, 2022, to present. The records should include: The date and time the transaction occurred, the direction of the transaction, the contact phone number, and indicate whether the user has deleted the message.  
  
The records should also include the **content** of the text messages including the media that was sent or received and the transcript of the message.
- C. All Call Logs associated with the Target Account and all transactional records outlining when the TextNow user made or received a voice call between September 1, 2022, to present. The information provided should include the call start date and time, the call end date and time, the caller and called number, as well as the duration of the call listed in seconds.
- D. All users that have blocked the Target Account, and all users the Account has blocked.
- E. All IP Logs that contain the IP address related to any text message or call and its corresponding timestamps for the Target Account between September 1, 2022, and present.
- F. All media, including images, videos, or voicemails sent or received by the Target Account between September 1, 2022, and present.
- G. All address book information, including all contacts and related sync information; and
- H. All location information from September 1, 2022, to present.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. §§ 2252A(a)(1) (transportation of child pornography), 2252A(a)(2)(A) (distribution, receipt and attempted receipt of child pornography), 2252A(a)(5)(B)

(possession of child pornography), 2422(b) (enticement of a minor to engage in sexual activity), and 2251(a) (sexual exploitation of children), for each account or identifier listed on Attachment

A, information pertaining to the following matters:

- A. Images and videos depicting children engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256;
- B. Electronic communications regarding children engaging in sexually explicit conduct;
- C. Communications with potential minors involving sexual topics or in an effort to seduce the minor;
- D. Evidence that would tend to identify the person who created and/or was using the account when any of the items listed in subparagraphs a-c were sent, read, copied or downloaded; and
- E. Evidence indicating how and when the Account was accessed or used, to determine the geographic and chronological context of account access, use, and events relating to the crimes under investigation and to the account owner;
- F. Evidence indicating the Account owner's state of mind as it relates to the crimes under investigation;
- G. The identity of the person(s) who created or used the Account, including records that help reveal the whereabouts of such person(s).